

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF NEW YORK**

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PETER YOUNG,

*Plaintiff*

**12-CV-1642**

**-AGAINST-**

GRAHAM, et. al.,

*Defendants.*

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**JURY VERDICT FORM**

1. Do you find by a preponderance of the evidence that any defendant listed below used excessive force against Peter Young on March 28, 2012 or failed to protect Peter Young from the use of force on March 28, 2012?

Joseph Vasile YES \_\_\_\_\_ NO \_\_\_\_\_

Harold Graham YES \_\_\_\_\_ NO \_\_\_\_\_

Paul Casler YES \_\_\_\_\_ NO \_\_\_\_\_

Trevor Heath YES \_\_\_\_\_ NO \_\_\_\_\_

Timothy Browers YES \_\_\_\_\_ NO \_\_\_\_\_

2. Do you find by a preponderance of the evidence that any defendant listed below used excessive force against Peter Young on January 4, 2013 or failed to protect Peter Young from the use of force on January 4, 2013?

Joseph Vasile YES \_\_\_\_\_ NO \_\_\_\_\_

Harold Graham YES \_\_\_\_\_ NO \_\_\_\_\_

Paul Casler YES \_\_\_\_\_ NO \_\_\_\_\_

Trevor Heath YES \_\_\_\_\_ NO \_\_\_\_\_

Timothy Browers YES \_\_\_\_\_ NO \_\_\_\_\_

3. Do you find by a preponderance of the evidence that any defendant listed below used excessive force against Peter Young during the time Peter Young was at the Auburn Correctional Facility at any time or failed to protect Peter Young from the use of force at any time?

Joseph Vasile YES \_\_\_\_\_ NO \_\_\_\_\_

Harold Graham	YES _____	NO _____
Paul Casler	YES _____	NO _____
Trevor Heath	YES _____	NO _____
Timothy Browers	YES _____	NO _____

If you answered "YES" in Question No. 1, 2, or 3 above to ANY defendant, proceed with Question No 4. If you answered "NO" in Question No. 1, 2, or 3 above to ALL defendants, proceed to Question 7.

4. As to any defendant for whom you answered "YES" in response to Question No. 1 above, do you find by a preponderance of the evidence that the excessive force used was a proximate cause of the injuries sustained by Peter Young?

Joseph Vasile	YES _____	NO _____
Harold Graham	YES _____	NO _____
Paul Casler	YES _____	NO _____
Trevor Heath	YES _____	NO _____
Timothy Browers	YES _____	NO _____

If you answered "YES" in Question No. 4 above as to ANY defendant, proceeds to Questions No. 5 and 6. If you answered "NO" to Question No. 4 as to ALL defendants, proceed to Question 7.

5. What amount of money do you find from a preponderance of the evidence will fairly compensate Peter Young for his damages for the use of excessive force?

\$ \_\_\_\_\_

6. With respect to the amount of compensatory or nominal damages you have indicated above, please indicate the percentage of that amount for which each of the following Defendants is liable.

Joseph Vasile \_\_\_\_\_%

Harold Graham \_\_\_\_\_ %

Paul Casler \_\_\_\_\_ %

Trevor Heath \_\_\_\_\_ %

Timothy Browers \_\_\_\_\_ %

7. Do you find by a preponderance of the evidence that any Defendant Frank Chandler with deliberate indifference to a risk of serious harm to the plaintiff by tampering or allowing tampering with Peter Youngs food?

YES \_\_\_\_\_ NO \_\_\_\_\_

If you answer Yes to Question 7 above proceed to Question 8. If you answered no proceed to Question 9.

8. What, if any, compensation or nominal damages is Peter Young entitled to as a result of the conduct of the Defendant Frank Chandler?

\$ \_\_\_\_\_

9. Do you find by a preponderance of the evidence that any Defendant Timothy Browers with deliberate indifference to a risk of serious harm to the plaintiff by tampering with his water supply and the water provided to him?

YES \_\_\_\_\_ NO \_\_\_\_\_

If you answer Yes to Question 9 above proceed to Question 10. If you answered no proceed to Question 10.

10. What, if any, compensation or nominal damages is Peter Young entitled to as a result of the conduct of the Defendant Timothy Browers?

\$ \_\_\_\_\_

11. If you have found any of the Defendants liable under any claim above, then you may consider whether Plaintiff should be awarded punitive damages as to any such Defendant.

Joseph Vasile YES \_\_\_\_\_ NO \_\_\_\_\_

Harold Graham YES \_\_\_\_\_ NO \_\_\_\_\_

Paul Casler YES \_\_\_\_\_ NO \_\_\_\_\_

Trevor Heath YES \_\_\_\_\_ NO \_\_\_\_\_

Timothy Browsers

YES \_\_\_\_\_ NO \_\_\_\_\_

Frank Chandler

YES \_\_\_\_\_ NO \_\_\_\_\_

Dated: \_\_\_\_\_

Foreperson: \_\_\_\_\_